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**From:** Tran, Xuan-Mai [Tran.Xuan-Mai@epa.gov]  
**Sent:** 9/27/2021 6:52:40 PM  
**To:** Chesnutt, John [Chesnutt.John@epa.gov]  
**Subject:** RE: Rad RG  
**Attachments:** HPS\_BW Rad RA\_AM\_2001.11.19.pdf

John,

Elaine found it @ SFRC. The attached Action Memorandum documents the cleanup goal for commercial use is “less than 5 pCi/g above background, averaged over 100 m<sup>2</sup>, for the top 15 cm” and 40 CFR 192.12(a) is the cleanup goal source.

I’m still looking for the source of the cleanup goal of 1pCi/g above background. There is another document called “Radiological Removal Action. Action Memorandum. FIPS. San Francisco, California”, August 17, 2000. The SFRC will send me the pdf of it by the end of this week as they have a hard copy but not has not been scanned. Hopefully, there is something in it that I was looking for.

Thanks,  
Xuan-Mai

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**From:** Chesnutt, John <Chesnutt.John@epa.gov>  
**Sent:** Monday, September 27, 2021 10:12 AM  
**To:** Tran, Xuan-Mai <Tran.Xuan-Mai@epa.gov>  
**Subject:** RE: Rad RG

Yes, this is the same difficulty we have faced when trying to find the basis for the RG. Thanks for looking.

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**From:** Tran, Xuan-Mai <Tran.Xuan-Mai@epa.gov>  
**Sent:** Monday, September 27, 2021 10:05 AM  
**To:** Chesnutt, John <Chesnutt.John@epa.gov>  
**Subject:** Rad RG

John,

While waiting for the Navy to search for the agreement between the Navy and the EPA on the RG for rad, I did some search myself. The agreement of 1 pCi/g + bg was referenced in many HP documents dated back to 2005. So this agreement must of made prior to 2005. There was one document that I was interested in, it’s called “Final Basewide Radiological Removal Action – Action Memorandum” dated 2001. I was hoping it might shed some lights on the agreement prior to 2005 documents. But out of lucks, it’s listed in the EnviroStor but it’s empty. I checked our own SFRC, it was checked out by Lily in 2016 and now marked “missing” since 2019. I’m asking DTSC/Hugo to check his internal system to see if he can find it at DTSC.

I’ll keep you posted.

Thanks,  
Xuan-Mai